



**T. A. BLACKBURN LAW**  
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BROOKLYN, NY 11236

March 14, 2022

**Via ECF**

The Honorable Susan D. Wigenton  
50 Walnut St #4015  
Newark, NJ 07102

Re: **Jones. v. Fox Rothschild, et al. No. 2:20-cv-06312 SDW-LDW**

Dear Judge Wigenton,

This firm represents Plaintiff Stephanie Jones in the above-referenced matter. On February 19, 2022, we wrote a letter to the court respectfully requesting the Court stay the proceedings and allow Plaintiff to file a Motion for Entry of Final Judgment pursuant to Fed. R. Civ. P. 54(B), and for Certification of Interlocutory appeal pursuant to 28 U.S.C. § 1292(b). The basis for this request's stems from a clear split in this District concerning the applicability of N.J.S.2A:14-2B, and section 2A:14-2a(a)(1) of New Jersey P.L. 2019, c. 120 (S477 SCS<sup>1</sup>) ("The Statute") to Plaintiff's claims.

On February 25, 2022, Defendant Fox Rothschild filed a letter opposing Plaintiff's request. The letter cited no case law to support their opposition and was tantamount to a toddler throwing a

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<sup>1</sup> It is important to note that every state court in New Jersey which have assessed the applicability of N.J.S.2A:14-2B, and section 2A:14-2a(a)(1) of New Jersey P.L. 2019, c. 120 (S477 SCS) to actions that are time-barred due to NJLAD's two-year statute of limitation, have all ruled that The Statute's two- year lookback window does apply to time-barred NJLAD claims.



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temper tantrum. At the end of their opposition letter, they requested that the court set a briefing schedule for the Motion for Entry of Final Judgment.

Plaintiff agrees with Defendant Fox Rothschild, and respectfully request that the court sets a briefing schedule for this motion. Plaintiff respectfully requests this Court stay the proceedings and allow Plaintiff to file a Motion for Entry of Final Judgment pursuant to Fed. R. Civ. P. 54(B), and for Certification of Interlocutory appeal pursuant to 28 U.S.C. § 1292(b).

Respectfully Submitted,

*Tyrone A. Blackburn, Esq.*  
Tyrone A. Blackburn, Esq.

Cc: All counsel of record (via ECF)